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August 26, 2003

VIA ELECTRONIC MAIL

Donald Abelson, Chief
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: First Report and Order and Further Notice of Proposed
Rulemaking in IB Docket No. 02-34, and First Report and Order
in IB Docket No. 02-54 (*"Space Station Licensing Reform Order"*)**

Dear Mr. Abelson:

This letter follows discussions last week in which, on behalf of Rainbow DBS Company LLC ("Rainbow DBS"), we raised with members of the International Bureau staff our concern that the unusual sequence of events combining the publication of the *Space Station Licensing Reform Order* and the Bureau's recent decision to grant incumbent Ka-band licensees priority over others in applying for available orbital slots may result in substantial prejudice to Rainbow DBS's interest in available Ka-band licenses. Rainbow DBS intends to apply for Ka-band licenses. Rainbow DBS respectfully reserves, however, all rights with regard to the concerns raised in our discussions with the International Bureau staff.

Respectfully submitted,

/s/

Benjamin J. Griffin
Counsel for Rainbow DBS

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